UNITED STATES DISTRICT COURT OF ALABAMA FOR THE MIDDLE DISTRICT, NORTHERN DIVISION

ROBERT JOHNSON, as personal *
representative of the Estate of IRENA *
JOHNSON *

Plaintiff, *

*
CIVIL /*

v. * CIVIL ACTION NO. 2:07cv1068-MHT

*

WILLIE EVA BALDWIN, et. al.,

*

Defendants.

*

EVIDENTIARY SUBMISSIONS IN OPPOSITION TO DEFENDANT BALDWIN'S MOTION FOR SUMMARY JUDGMENT

COMES NOW, the Plaintiff, by and through his counsel of record and files with his Brief in Opposition to Defendant Willie Eva Baldwin's Motion for Summary Judgment the following evidentiary submissions:

- 1. **Exhibit A** Plaintiff's Second Amended Complaint.
- 2. **Exhibit B** Deposition of Defendant Willie Eva Baldwin.
- 3. **Exhibit C** Plaintiff's Exhibit 4 Alabama Uniform Traffic Accident Report attached to deposition of Plaintiff Robert Johnson.
- 4. **Plaintiff's Exhibit 49** Photograph attached to deposition of Defendant Baldwin. (Exhibit B)
- 5. **Plaintiff's Exhibit 50** Photograph attached to deposition of Defendant Baldwin. (Exhibit B)
- 6. **Plaintiff's Exhibit 55** Photograph attached to deposition of Defendant Baldwin. (Exhibit B)

Respectfully submitted this the 15th day of August, 2008.

/s/ Zachary T. Collins

ZACHARY T. COLLINS (COL126)
Attorney for the Plaintiff

OF COUNSEL:

ZACHARY T. COLLINS, ATTORNEY AT LAW, LLC 318 N. Decatur Street

Montgomery, Alabama 36104

Tel: 334-263-5575 Fax: 334-263-5569

CERTIFICATE OF SERVICE

I, Zachary T. Collins, certify that on the 15 th day of August, 2008, the foregoing document was served on counsel/adverse party listed below, properly addressed and prepaid, in the following manner:
 () Facsimile; () Facsimile, original to follow by United States mail, first class, properly addressed; () United States mail, first class, properly addressed; () United States mail, Express Mail delivery; () Federal Express, overnight delivery; () United Parcel Service, overnight delivery; () Hand delivery; (X) CM/ECF
OF COUNSEL:
DAVID H. HENDERSON (ASB-4048-D57H)

RANDALL MORGAN (ASB-8650-R70R)

Attorneys for Defendant Willie Eva Baldwin Hill, Hill, Carter, Franco, Cole & Black, P.C. P.O. Box 116 Montgomery, AL 36101-0116

J. LENN RYALS, ESQ.

Attorneys for Defendant Willie Eva Baldwin RYALS, PLUMMER, DONALDSON AGRICOLA & SMITH, P.C.

60 Commerce Street, Ste. 1400 Montgomery, Alabama 36104

/s/ Zachary T. Coll	ins
OF COUNSEL	